

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	CHAPTER 11
	§	
REMARKABLE HEALTHCARE OF CARROLLTON LP, ET AL.,¹	§	CASE NO. 24-40605
	§	
	§	(Joint Administration Requested)
	§	
DEBTORS.	§	

NOTICE OF CONSENT AND AGREEMENT TO EXTEND OBJECTION DEADLINE

PLEASE TAKE NOTICE that Remarkable Healthcare of Carrollton, LP and its affiliated debtors and debtors-in-possession, (together, the “**Debtors**”) and the United States of America (the “**United States**”), on behalf of the Department of Health and Human Services (“**HHS**”), acting through its designated component, the Centers for Medicare & Medicaid Services (“**CMS**”), hereby agree to a one (1) week extension for Debtors to object to the *United States’ Motion for Relief from the Automatic Stay to Set Off Mutual Debts* (the “**US Motion**”) [Dckt. No. 163]. The communications between the parties agreeing to the one-week extension is attached hereto as Exhibit A.

PLEASE TAKE NOTICE that upon the parties’ mutual consent and agreement, the new deadline for Debtors to file their objection to the US Motion is hereby extended to **July 15, 2024**.

¹ The Debtors have requested the joint administration of the following chapter 11 cases (followed by the last four digits of each Debtor’s federal tax identification number): Remarkable Healthcare of Carrollton, LP (5960), Remarkable Healthcare of Dallas, LP (3418), Remarkable Healthcare of Fort Worth (1692), Remarkable Healthcare of Seguin, LP (4566), and Remarkable Healthcare, LLC (5142).

Dated: July 5, 2024
Dallas, Texas

GUTNICKI LLP

/s/ Liz Boydston

Liz Boydston (SBN 24053684)
Alexandria Rahn (SBN 24110246)
10440 N. Central Expy., Suite 800
Dallas, Texas 75231
Telephone: (469) 935-6699
Facsimile: (469) 895-4413
lboydston@gutnicki.com
arahn@gutnicki.com

-and-

Max Schlan (admitted *Pro Hac Vice*)
45 Rockefeller Plaza
Suite 2000
New York, New York 10111
Telephone: (646) 825-2330
Facsimile: (646) 825-2330
mschlan@gutnicki.com

Counsel for the Debtors and Debtors in Possession

Exhibit A

From: Liz Boydston
Sent: Friday, July 5, 2024 11:59 AM
To: Tharpe, Whitney (USATXE)
Cc: Max Schlan; Alexandria Rahn; Ren-Ann Wang
Subject: Re: Request for extension of objection to Dkt. 163 Motion for Relief from Stay

Thank you.

Liz Boydston (she/her)

Partner



p (469) 895-4413

c (214) 403-7901

lboydston@gutnicki.com www.gutnicki.com

On Jul 5, 2024, at 10:39 AM, Tharpe, Whitney (USATXE) <Whitney.Tharpe@usdoj.gov> wrote:

Hi Liz,

No objection to an extension.

Thanks,
Whitney

Whitney Tharpe
Assistant United States Attorney
United States Attorney's Office
Eastern District of Texas, Civil Division
Office: 903-510-9357
E-Mail: Whitney.Tharpe@usdoj.gov

From: Tharpe, Whitney (USATXE)
Sent: Thursday, July 4, 2024 11:19 AM
To: Liz Boydston <lboydston@gutnicki.com>
Cc: Max Schlan <mschlan@gutnicki.com>; Alexandria Rahn <arahn@gutnicki.com>; Ren-Ann Wang <rwang@gutnicki.com>
Subject: RE: Request for extension of objection to Dkt. 163 Motion for Relief from Stay

Hi Liz,

I'm working today because I have a deposition at 7:30 tomorrow A.M. – I passed this along to HHS/OGC and will let you know as soon as I hear.

Thanks,

Whitney

From: Liz Boydston <lboydston@gutnicki.com>

Sent: Wednesday, July 3, 2024 2:57 PM

To: Tharpe, Whitney (USATXE) <WTharpe@usa.doj.gov>

Cc: Max Schlan <mschlan@gutnicki.com>; Alexandria Rahn <arahnn@gutnicki.com>; Ren-Ann Wang <rwang@gutnicki.com>

Subject: [EXTERNAL] Request for extension of objection to Dkt. 163 Motion for Relief from Stay

Hi Whitney, can I please get a 1 week extension on Dkt. 163 the Motion for Relief you filed? I've been crushed and we've had so many days in Judge Rhoades's court, and I'm in depos on Friday and Monday. Can I file a Notice of Consent and Agreement to Extend Objection Deadline to July 15th?

Thanks for your consideration, and hope you have a great 4th.

Liz Boydston (she/her)

Partner

<image001.png>

10440 N. Central Expressway, Suite 800 / Dallas, Texas 75231

p / (469) 895-4413 c / (214) 403-7901 f / (469) 895-4413

lboydston@gutnicki.com / www.gutnicki.com

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